

Document Page 1 of 7  
**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF MASSACHUSETTS**  
**EASTERN DIVISION**

**CHAPTER 13 PLAN COVER SHEET**

Filing Date: <u>3/29/2013</u>	Docket #: <u>13-11789</u>
Debtor: <u>Vladimir Felix Sirotn</u>	Co-Debtor: _____
SS#: <u>xxx-xx-2673</u>	SS#: _____
Address: <u>183 Rock Street</u>	Address: _____
<u>Norwood, MA 02062</u>	_____
_____	_____
_____	_____

Debtor's Counsel: Dax Grantham  
Address: Grantham Cencarik, PC  
271 Cambridge Street  
Cambridge, MA 02141  
\_\_\_\_\_  
\_\_\_\_\_

Telephone #: (617) 497-7141  
Facsimile #: (617) 497-7140  
Email Address: dbg@boston-legal.com

ATTACHED TO THIS COVER SHEET IS THE CHAPTER 13 PLAN FILED BY THE DEBTOR(S) IN THIS CASE. THIS PLAN SETS OUT THE PROPOSED TREATMENT OF THE CLAIMS OF CREDITORS. THE CLAIMS ARE SET FORTH IN THE BANKRUPTCY SCHEDULES FILED BY DEBTOR(S) WITH THE BANKRUPTCY COURT.

YOU WILL RECEIVE A SEPARATE NOTICE FROM THE BANKRUPTCY COURT OF THE SCHEDULED CREDITORS' MEETING PURSUANT TO 11 U.S.C. § 341. THAT NOTICE WILL ALSO ESTABLISH THE BAR DATE FOR FILING PROOFS OF CLAIMS.

PURSUANT TO THE MASSACHUSETTS LOCAL BANKRUPTCY RULES, YOU HAVE UNTIL THE LATER OF (I) THIRTY (30) DAYS AFTER THE DATE ON WHICH THE FIRST § 341 MEETING IS HELD OR (II) THIRTY (30) DAYS AFTER SERVICE OF AN AMENDED OR MODIFIED PLAN, TO FILE AN OBJECTION TO CONFIRMATION OF THE CHAPTER 13 PLAN, WHICH OBJECTION MUST BE SERVED ON THE DEBTOR, DEBTOR'S COUNSEL AND THE CHAPTER 13 TRUSTEE.

Document Page 2 of 7  
**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF MASSACHUSETTS**  
**EASTERN DIVISION**

**OFFICIAL LOCAL FORM 3**  
**PRE-CONFIRMATION CHAPTER 13 PLAN**

DEBTORS: (H) Vladimir Felix Sirotin Docket # 13-11789  
(W) \_\_\_\_\_ SS # xxx-xx-2673  
SS # \_\_\_\_\_

**I. PLAN PAYMENT AND TERM:**

Debtor(s) shall pay monthly to the Trustee the sum of \$950.00 for the term of:

- ☐ 36 Months. 11 U.S.C. § 1325(b)(4)(A)(i);  
☐ 60 Months. 11 U.S.C. § 1325(b)(4)(A)(ii);  
☐ 60 Months. 11 U.S.C. § 1322(d)(2). Debtor avers the following cause:

or ☒ 53 Months. The Debtor states as reasons therefore:

**100% repayment plan**

**II. SECURED CLAIMS:**

**A. Claims to be paid through the plan (including arrears):**

<u>Creditor</u>	<u>Description of Claim (pre-petition arrears, purchase money, etc.)</u>	<u>Amount of Claim</u>
<b>American Home Mtg Srv/Homeward Residenta</b>	<b>Arrearage claim</b>	<b>\$832.00</b>
<b>Chase</b>	<b>Arrearage claim</b>	<b>\$43,698.00</b>
Total of secured claims to be paid through the Plan:		<b>\$44,530.00</b>

**B. Claims to be paid directly by debtor to creditors (Not through Plan):**

<u>Creditor</u>	<u>Description of Claim</u>
<b>American Home Mtg Srv/Homeward Residenta</b>	<b>Real Estate Mortgage without Other Collateral</b>
<b>Bk Of Amer</b>	<b>Conventional Real Estate Mortgage</b>
<b>Chase</b>	<b>Conventional Real Estate Mortgage</b>
<b>Green Tree Servicing L</b>	<b>Real Estate Mortgage without Other Collateral</b>
<b>Ocwen Loan Services LLC</b>	<b>fee simple</b>

**C. Modification of Secured Claims:**

<u>Creditor</u>	<u>Details of Modification (Additional Details May Be Attached)</u>	<u>Amount of Claim to Be Paid Through Plan</u>
Total of modified secured claims to be paid through the Plan:		<b>\$0.00</b>

**D. Leases:**

- i. The Debtor(s) intend(s) to reject the residential/personal property lease claims of  
ii. The Debtor(s) intend(s) to assume the residential/personal property lease claims of

## Chapter 13 Plan

Document Page 3 of 7  
Case No: 13-11789  
Debtor(s): Vladimir Felix Sirotin

iii. The arrears under the lease to be paid under the plan are:

<u>Party</u>	<u>Amount to Be Paid Through Plan</u>
--------------	---

## III. PRIORITY CLAIMS:

## A. Domestic Support Obligations:

<u>Creditor</u>	<u>Description of Claim</u>	<u>Amount of Claim</u>
-----------------	-----------------------------	------------------------

## B. Other:

<u>Creditor</u>	<u>Description of Claim</u>	<u>Amount of Claim</u>
-----------------	-----------------------------	------------------------

Total of Priority Claims to Be Paid Through the Plan: \$0.00

## IV. ADMINISTRATIVE CLAIMS:

A. Attorneys Fees (to be paid through the plan): \$0.00

## B. Miscellaneous Fees:

<u>Creditor</u>	<u>Description of Claim</u>	<u>Amount of Claim</u>
-----------------	-----------------------------	------------------------

C. The Chapter 13 Trustee's fee is determined by Order of the United States Attorney General. The calculation of the Plan payment set forth utilizes a 10% Trustee's commission.

## V. UNSECURED CLAIMS:

The general unsecured creditors shall receive a dividend of 100.00% of their claims.

A. General unsecured claims: \$266.00

## B. Undersecured claims arising after lien avoidance/cramdown:

<u>Creditor</u>	<u>Description of Claim</u>	<u>Amount of Claim</u>
-----------------	-----------------------------	------------------------

## C. Non-Dischargeable Unsecured Claims:

<u>Creditor</u>	<u>Description of Claim</u>	<u>Amount of Claim</u>
-----------------	-----------------------------	------------------------

Total of Unsecured Claims (A + B + C): \$266.00

D. Multiply total by percentage: \$785.00

(Example: Total of \$38,500.00 x .22 dividend = \$8,470.00)

## E. Separately classified unsecured claims (co-borrower, etc.):

<u>Creditor</u>	<u>Description of Claim</u>	<u>Amount of Claim</u>
-----------------	-----------------------------	------------------------

Total amount of separately classified claims payable at 100%: \$0.00

## VI. OTHER PROVISIONS:

## A. Liquidation of assets to be used to fund plan:

## B. Miscellaneous Provisions:

**Chapter 13 Plan**

Document Page 4 of 7

Case No: 13-11789

Debtor(s): **Vladimir Felix Sirotin**

## VII. CALCULATION OF PLAN PAYMENT:

a) Secured claims (Section II-A Total):	<u>\$44,530.00</u>
b) Modified Secured Claims (Section II-C Total):	<u>\$0.00</u>
c) Lease arrears (Section II-D.iii. Total):	<u>\$0.00</u>
d) Priority claims (Section III-A & B Total):	<u>\$0.00</u>
e) Administrative claims (Section IV-A & B Total):	<u>\$0.00</u>
f) Regular unsecured claims (Section V-D Total):	<u>\$785.00</u>
g) Separately classified unsecured claims (Section V-E Total):	<u>\$0.00</u>
h) Total of a + b + c + d + e + f + g above:	<u>\$45,315.00</u>
i) Divide (h) by <u>0.90</u> for total including Trustee's fee:	Cost of Plan = <u>\$50,350.00</u>
(This represents the total amount to be paid into the Chapter 13 Plan.)	

j) Divide (i), Cost of Plan, by Term of Plan, <u>53</u> months	<u>\$950.00</u>
k) Round up to nearest dollar: Monthly Plan Payment =	<u>\$950.00</u>
(Enter this amount on page 1)	

Pursuant to 11 U.S.C. § 1326(a)(1) unless the Court orders otherwise, debtor shall commence making the payments proposed by a plan within thirty (30) days after the petition is filed. Pursuant to 11 U.S.C. § 1326(a)(1)(C), the debtor shall make preconfirmation adequate protection payments directly to the secured creditor.

## Chapter 13 Plan

Document Page 5 of 7

Case No: 13-11789

Debtor(s): Vladimir Felix Sirotin

## VIII. LIQUIDATION ANALYSIS

## A. Real Estate:

<u>List Each Address</u>	<u>Fair Market Value</u>	<u>Total Amount of Recorded Liens (Schedule D)</u>
<b>55-61 Walsh Street</b>	<b>\$323,000.00</b>	<b>\$450,000.00</b>
<b>72 Bryon Road, Unit 4</b>	<b>\$125,000.00</b>	<b>\$152,071.00</b>
<b>Residence</b>	<b>\$360,000.00</b>	<b>\$390,731.00</b>
Total Net Equity for Real Property:		<b>\$0.00</b>
Less Total Exemptions (Schedule C):		<b>\$0.00</b>
Available Chapter 7:		<b>\$0.00</b>

## B. Automobile:

<u>Describe year, make, model</u>	<u>Value</u>	<u>Lien</u>	<u>Exemption</u>
<b>2009 Mercedes ML350 40,000 miles</b>	<b>\$23,725.00</b>	<b>\$0.00</b>	<b>\$7,500.00</b>
Total Net Equity:			<b>\$23,725.00</b>
Less Total Exemptions (Schedule C):			<b>\$7,500.00</b>
Available Chapter 7:			<b>\$16,225.00</b>

## C. All other Assets: (All remaining items on schedule B) : (Itemize as necessary)

<u>Description</u>	<u>Value</u>	<u>Lien</u>	<u>Exemption</u>
<b>Personal Bank accounts Joint account/ debtors portion of balance lis</b>	<b>\$7,500.00</b>	<b>\$0.00</b>	<b>\$7,500.00</b>
<b>Home Furnishings debtors portion listed</b>	<b>\$5,000.00</b>	<b>\$0.00</b>	<b>\$5,000.00</b>
<b>personal clothing</b>	<b>\$2,000.00</b>	<b>\$0.00</b>	<b>\$2,000.00</b>
<b>personal jewelry and watches</b>	<b>\$500.00</b>	<b>\$0.00</b>	<b>\$500.00</b>
<b>Merrill Lynch IRA</b>	<b>\$20,000.00</b>	<b>\$0.00</b>	<b>\$20,000.00</b>
<b>Merrill Lynch investment account debtor's portion listed</b>	<b>\$25,000.00</b>	<b>\$0.00</b>	<b>\$6,000.00</b>
<b>MIR Realty Corp. sole shareholder of real estate business liquidation</b>	<b>\$90,000.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
Total Net Value:			<b>\$150,000.00</b>
Less Exemptions (Schedule C):			<b>\$41,000.00</b>
Available Chapter 7:			<b>\$109,000.00</b>

## D. Summary of Liquidation Analysis (Total amount available under Chapter 7):

Net Equity (A and B) plus Other Assets (C) less all claimed exemptions: **\$125,225.00**

Additional Comments regarding Liquidation Analysis:

**Chapter 13 Plan**

Case No: 13-11789

Debtor(s): **Vladimir Felix Sirotin****IX. SIGNATURES**

Pursuant to the Chapter 13 rules, the debtor or his or her attorney is required to serve a copy of the Plan upon the Chapter 13 Trustee, all creditors and interested parties, and to file a Certificate of Service accordingly.

**/s/ Dax Grantham**

Debtor's Attorney

**4/22/2013**

Date

Attorney's Address: **Grantham Cencarik, PC****271 Cambridge Street****Cambridge, MA 02141**Tel. # **(617) 497-7141**Email Address: **dbg@boston-legal.com**

I/WE DECLARE UNDER THE PENALTIES OF PERJURY THAT THE FOREGOING REPRESENTATIONS OF FACT ARE TRUE AND CORRECT TO THE BEST OF OUR KNOWLEDGE AND BELIEF.

**/s/ Vladimir Felix Sirotin**

Debtor

**4/22/2013**

Date

Debtor

Date

Document Page 7 of 7  
**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

IN RE: **Vladimir Felix Sirotin**

CASE NO. **13-11789**

CHAPTER **13**

**Certificate of Service**

---

I, Dax B. Grantham, counsel for the Debtor(s), hereby certify that on the date indicated below that I served a copy of the foregoing document, including any attachments, upon the parties listed below by first class mail, postage prepaid, and via ECF, if that party is so designated.

Date: **4/22/2013**

**/s/ Dax Grantham**

**Dax Grantham**

Attorney for the Debtor(s)

American Home Mtg Srv/Homeward  
Residenta  
AHMSI / Attention: Bankruptcy  
PO Box 631730-1730  
Irving, TX 75063

Internal Revenue Service  
P.O. Box 21126  
Philadelphia, PA 19114

Bk Of Amer  
Attn: Correspondence Unit/CA6-919-02-  
41  
PO Box 5170  
Simi Valley, CA 93062

MA Dept of Revenue  
Bankrutpcy Unit  
PO Box 9564  
Boston, MA 02204-7605

Carolyn Bankowski  
Office of the Chapter 13 Trustee  
PO Box 8250  
Boston, MA 02114

Ocwen Loan Services LLC  
c/o Gary Marinosci  
1350 Division Road, Suite 301  
West Warwick, RI 02893

Chase  
Po Box 24696  
Columbus, OH 43224

Victoria Drizin Sirotin  
183 Rock Street  
Norwood, MA 02062

Collection  
8875 Aero Dr Ste 200  
San Diego, CA 92123

Vladimir Felix Sirotin  
183 Rock Street  
Norwood, MA 02062

Green Tree Servicing L  
Po Box 6172  
Rapid City, SD 57709